

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
EMPIRE COMMUNITY DEVELOPMENT LLC,

Docket No.: 7:25-cv-04192-KMK

Plaintiff,

-AGAINST-

DERRICK WALTERS, UNITED STATES OF AMERICA
OBO INTERNAL REVENUE SERVICE; HUDSON
HERITAGE FEDERAL CREDIT UNION; SOUTH
SHORE ADJUSTMENT CO LLC AS SUCCESSOR
ASSIGNEE IN INTEREST TO GE MONEY BANK; NEW
YORK STATE DEPARTMENT OF TAXATION AND
FINANCE CIVIL ENFORCEMENT - CO - ATC

Defendants.

-----X

NOTICE OF MOTION TO REMAND MATTER BACK TO STATE COURT

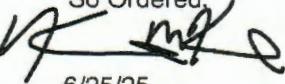
PLEASE TAKE NOTICE, that Plaintiff Empire Community Development LLC
("Plaintiff" or "Empire"), by and through its counsel Margolin, Weinreb & Nierer, LLP, hereby
moves the Court, for an order i) remanding this matter back to state court pursuant to 28 U.S.C. §§
1446(b) and 1447(c), and ii) for such other and further relief this Court deems just and proper. In
support of this Motion, Plaintiff relies upon the Declaration of Seth D. Weinberg, Esq. dated June
24, 2025, the exhibits annexed thereto, the Memorandum of Law in Support of Seth D. Weinberg,
Esq. dated June 24, 2025, and all pleadings filed in this action that are referenced in the instant
motion.

[SIGNATURE PAGE TO FOLLOW]

Dated: June 24, 2025
Syosset, New York

MARGOLIN, WEINREB & NIERER, LLP
/s/ Seth D. Weinberg
Seth D. Weinberg, Esq.
575 Underhill Boulevard, Suite 224
Syosset, New York 11791
T: 516-921-3838
E: seth@nyfclaw.com
Counsel for Plaintiff

Motion is denied without prejudice for
failure to follow the Court's Individual
Practices.

So Ordered.

6/25/25